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April 14, 2025

BY ECF

Honorable Joseph A. Marutollo
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: Ricco D. Slade v. City of New York, et al.,
24-CV-6711 (NCM) (JAM)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, and write on behalf of the City as an interested party in the above-referenced matter.¹ I write in response to the Court's *Valentin* Order dated December 10, 2024 (ECF No. 11) to complete the identification of the John Doe defendants in this action, and to confirm that the City now represents defendant Stephen Gassick in this matter, and to respectfully request an extension of time for Detective Gassick to respond to the Complaint. Due to plaintiff's incarcerated status, we were unable to obtain his position on this request. This is the first request for an extension of time for Detective Gassick to answer or otherwise respond to the complaint.

By way of background, Plaintiff brings claims under 42 U.S.C. § 1983 arising from, *inter alia*, his December 28, 2022 arrest by detectives from the 110th Precinct in Queens. By Order dated December 10, 2024, this Court directed the Corporation Counsel to identify two John Doe Detectives pursuant to *Valentin v. Dinkins*, 121 F.3d 72 (2d Cir. 1997). On February 13, 2025, this Office partially responded to the *Valentin* Order, identifying Detective Stephen Gassick as the primary detective who handled Plaintiff's arrest (ECF No. 15). In that filing, this Office reported that despite diligent investigation, we had been unable to identify the second John Doe detective, whose involvement with Plaintiff's arrest appears to have been minimal. The Court granted two

¹ This case has been assigned to Assistant Corporation Counsel John McLaughlin, who is presently awaiting admission to the Eastern District of New York and is handling this matter under my supervision. Mr. McLaughlin may be reached directly at (212) 356-2670 or by email at jmclaugh@law.nyc.gov.

additional extensions of time to complete the *Valentin* response, with the current deadline set for April 14, 2025 (ECF Order dated March 12, 2025).

Following continued investigation and multiple discussions with Detective Gassick, this Office has now identified the second John Doe detective from Plaintiff's complaint, as follows:

- Detective Julio Tejada, Shield No. 2074, Tax ID: 939563; Service Address: 1 Police Plaza, Room 110A, New York, NY 10038

With this submission, on information and belief, the City has now fully responded to the Court's *Valentin* Order by identifying both individuals who were previously designated as John Doe defendants. Furthermore, pursuant to the Court's Order dated March 12, 2025, this Office confirms that it will represent Detective Stephen Gassick in this action.

Although not yet reflected on the docket, this Office is aware that Detective Gassick has been served in this matter. Accordingly, we respectfully request that Detective Gassick be afforded an extension of time to respond to the Complaint to match that of Detective Tejada once he has been served.

Respectfully Submitted,

Joseph Zangrilli /s/

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